

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MING HOM, individually and on	:	Case No. 15 Civ. 9539 GHW
behalf of all others similarly situated,	:	
	:	Class Action
Plaintiff,	:	
	:	
vs.	:	
	:	
VALE S.A., MURILO PINTO DE	:	
OLIVEIRA FERREIRA, and	:	
LUCIANO SIANI PIRES,	:	
	:	
Defendants.	:	
<hr/>		x
<hr/>		x
VALLI T. CHIN, individually and on	:	Case No. 16 Civ. 0658 GHW
behalf of all others similarly situated,	:	
	:	Class Action
Plaintiff,	:	
	:	
vs.	:	
	:	
VALE S.A., MURILO PINTO DE	:	
OLIVEIRA FERREIRA, LUCIANO	:	
SIANI PIRES, and PETER	:	
POPPINGA,	:	
	:	
Defendants.	:	
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**Cristiano Laux's Motion for Consolidation of Related Cases,
for Appointment of Lead Plaintiff, and for Approval of
Selection of Lead Counsel and Liaison Counsel**

PLEASE TAKE NOTICE that, under Section 21D(a)(3)(B) of the Securities
and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private

Securities Litigation Reform Act of 1995, movant Cristiano Laux will respectfully move, at a date and time as set by the Court, before the Honorable Gregory H. Woods, in Courtroom 12C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for entry of an order:

- (a) consolidating the two related cases captioned above for all purposes under Rule 42(a) of the Federal Rules of Civil Procedure;
- (b) appointing Mr. Laux as lead plaintiff in the consolidated action;
- (c) approving the selection of Bottini & Bottini, Inc. as lead counsel and Bernstein Liebhard LLP as liaison counsel; and
- (d) granting such other and further relief as the Court deems just and proper.

In support of this motion, Mr. Laux submits the accompanying memorandum of law and the Declaration of Albert Y. Chang (with exhibits) and a [Proposed] Order, and relies on all papers and proceedings in these actions.

Dated: February 5, 2016

BOTTINI & BOTTINI, INC.
Francis A. Bottini, Jr.
Albert Y. Chang

s/ Albert Y. Chang

Albert Y. Chang

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